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EDWARD S. PANZER MARIO J. DEROSSI OF COUNSEL

December 20, 2023

## **VIA ECF**

The Honorable Victor Marrero United States Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. Saro Mouradian, et al.

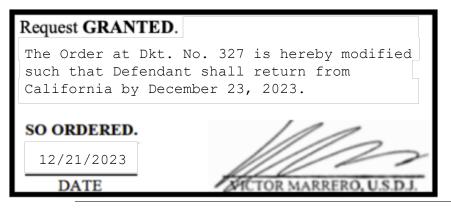
20 CR 652 (VM)

Dear Judge Marrero:

I write, with no objection from the government and Pretrial Services, to respectfully request that this Court modify the previous order granting Mr. Mouradian permission to travel with his daughters to their out of state rhythmic gymnastics events (Doc. No. 327).

Mouradian was scheduled to return home today. Unfortunately he missed his flight due to heavy traffic in Los Angeles, California. Mouradian left for the airport four hours prior to the flight and still ended up missing his flight. The next available flight out of Los Angeles, California is at 9:10 PM on December 22, 2023. He is scheduled to arrive home in the early morning on December 23, 2023. While in Los Angeles, California, he is staying at his mother in laws residence. He has conveyed all of this information to his pretrial officer.

Accordingly, we are respectfully requesting that this Court modify the previous Order to include a return date of December 23, 2023.



Respectfully submitted,

/s/

Joseph DiBenedetto